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August 5, 2025

**BY ECF**

The Honorable Arun Subramanian  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Khalil, et al. v. Trustees of Columbia University*,  
25 Civ. 02079 (AS)

Dear Judge Subramanian:

Plaintiffs respectfully request that the Court take judicial notice of two recent articles that directly relate to Plaintiffs' claims articulated in opposition to Defendants' pending Motion to Dismiss regarding their First Amendment right to receive information, *see* ECF 102, at 16-18, and the IHRA definition of antisemitism violative of their First Amendment rights, *see* ECF 102, at 11-14; ECF 104, at 13-16. The first is an open letter written by Columbia University Professor Emeritus Rashid Khalidi to Columbia University President Claire Shipman as published in *The Guardian*.<sup>1</sup> *See* Exhibit 1. The second is an interview with Professor Khalidi on *Democracy Now!*, providing more detail and facts regarding the open letter.<sup>2</sup> *See* Exhibit 2.

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<sup>1</sup> *See* Rashid Khalidi, "I spent decades at Columbia. I'm withdrawing my fall course due to its deal with Trump," *The Guardian* (Aug. 1, 2025), available at <https://www.theguardian.com/commentisfree/2025/aug/01/columbia-historian-rashid-khalidi-open-letter> (stating that "it is impossible to teach [the modern Middle East history] course (and much else) in light of Columbia's adoption of the International Holocaust Remembrance Alliance (IHRA) definition of antisemitism.").

<sup>2</sup> *See*, "Prof. Rashid Khalidi Slams "Crushing Repression" at Columbia, Cancels Course over Trump Settlement," *Democracy Now!* (Aug. 4, 2025), available at [https://www.democracynow.org/2025/8/4/rashid\\_khalidi\\_columbia\\_higher\\_education\\_trump](https://www.democracynow.org/2025/8/4/rashid_khalidi_columbia_higher_education_trump).

The Court can take judicial notice of these recent publications in considering the pending motions. *See Garber v. Legg Mason, Inc.*, 347 Fed. App'x 665, 669 (2d Cir. 2009) (finding courts may take judicial notice of news articles on a motion to dismiss even if not “mentioned on the face of the complaint”); *El Omari v. Buchanan*, No. 20 CIV. 2601 (VM), 2021 WL 5889341, at \*11 (S.D.N.Y. Dec. 10, 2021), *aff'd*, No. 22-55-CV, 2022 WL 4454536 (2d Cir. Sept. 26, 2022) (taking judicial notice of a published op-ed); *Yost v. Everyrealm, Inc.*, 657 F. Supp. 3d 563, 567 n.2 (S.D.N.Y. 2023) (taking judicial notice of news articles).

Respectfully submitted,

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